
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No: 17-16102
)	
Todd C Fuller)	Chapter 13
)	
Debtor(s).)	Judge: Janet S. Baer (Kane)

NOTICE OF MOTION

TO: Todd C Fuller, 38 Woodridge Rd. Montgomery, IL 60538 *via US mail*
Trustee Glenn B Stearns, 801 Warrenville Road, Suite 650, Lisle, IL 60532 *via ECF clerk's electronic delivery system*
U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*
See attached service list

PLEASE TAKE NOTICE that on **March 29, 2019 at 10:00 a.m.**, I shall appear before the Honorable Judge Janet S. Baer at Kane Courthouse, 100 S 3rd Street, Courtroom 240, Geneva, Illinois 60134 or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on March 8, 2019 before the hour of 6:00 p.m. from the office located at 4131 Main Street., Skokie, Illinois 60076.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St,
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Todd C Fuller, by and through his attorneys, the law office of CUTLER & ASSOCIATES, and in support of this Motion, states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on May 24, 2017.
3. The Debtor's Plan was confirmed with a payment of \$220 for 36 months with unsecured creditors receiving 10% of their unsecured claims.
4. The Debtor as of the date of this motion has a default of \$615.
5. The Debtor's plan was modified on February 16, 2018 to defer his default of \$560 to the end of the plan.
6. The Debtor has fallen behind on his plan payments because he had taken unpaid time from work as he was ill and was undergoing medical testing and he incurred out of pocket medical bills. The Debtor is now back to work and can make his plan payments going forward but he is not able to catch up on the full default amount.
7. The Debtor is looking to defer his current plan default to the end of the plan.

8. The Debtor seeks to modify his plan post confirmation to defer the current trustee default to the end of the plan.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's Plan Post Confirmation to defer the current default until the end of the plan; and for such further relief that this Court may deem just and proper.

Dated: March 8, 2019

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600